

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA VIDAL,  
ANTONIO ALARCON, ELIANA FERNANDEZ,  
CARLOS VARGAS, MARIANO  
MONDRAGON, and CAROLINA FUNG FENG,  
on behalf of themselves and all other similarly  
situated individuals, and MAKE THE ROAD  
NEW YORK, on behalf of itself, its members, its  
clients, and all similarly situated individuals.

*Plaintiffs,*

v.

KIRSTJEN M. NIELSEN, Secretary of the  
Department of Homeland Security, JEFFERSON  
BEAUREGARD SESSIONS III, Attorney General  
of the United States, and DONALD J. TRUMP,  
President of the United States,

*Defendants.*

Case No. 1:16-cv-04756 (NGG) (JO)

**NOTICE OF ERRATA AND  
CORRECTION TO EXHIBITS  
ACCOMPANYING  
PLAINTIFFS' MEMORANDUM  
OF LAW IN OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS**

**TO THE HONORABLE DISTRICT COURT:**

Plaintiffs hereby give notice of errata to the Court and all parties regarding exhibits accompanying Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss, ECF No. 240-1. Exhibit H in the filing is an incorrect version of Ms. Taylor's declaration in support of Plaintiffs' opposition to the motion to dismiss, Exhibits I-L contained personal identifying information requiring redaction, and Exhibits I and J were incorrect versions of those documents. Finally, Exhibits I-L were mislabeled. For these reasons, Plaintiffs hereby are filing a corrected set of exhibits to replace the filing currently docketed at ECF No. 240-1. This set consists of Exhibits A-H and Declaration Exhibits A-D. Plaintiffs regret any inconvenience caused by this error.

Respectfully submitted,

Date: January 14, 2018

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<sup>†</sup> Motion for pro hac vice forthcoming

\* Admitted only in Louisiana, application pending in New York

**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2018, true and correct copies of the foregoing Notice of Errata and Correction to Exhibits Accompanying Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss, and exhibits attached thereto, were filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Michael J. Wishnie

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